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17 Chang's Dynasty LLC and Alan Chang

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19 **UNITED STATES DISTRICT COURT**
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21 **DISTRICT OF NEVADA**

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23 THE SPEARMINT RHINO COMPANIES
24 WORLDWIDE, INC., and K-KEL, INC.,

25 Plaintiffs,

26 v.

27 CHANG'S DYNASTY LLC, and
28 ALAN CHANG,

29 Defendants.

30 Case No. 2:23-cv-02040-ART-BNW

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32 **STIPULATION AND [PROPOSED]**
33 **ORDER TO EXTEND TIME TO**
34 **RESPOND TO COMPLAINT**

35
36 **[First Request]**

STIPULATION AND [PROPOSED] ORDER TO
EXTEND TIME TO RESPOND TO COMPLAINT

Plaintiffs The Spearmint Rhino Companies Worldwide, Inc., and K-Kel, Inc., (“Plaintiffs”) and Defendants Chang’s Dynasty LLC and Alan Chang (“Defendants”) stipulate to extend the time by which Defendants may respond to the Complaint in this action by 21 days from January 10, 2024 to January 31, 2024, and to otherwise set the date by which Defendant Alan Chang may respond to the Complaint as January 31, 2024, and in support thereof, say:

1. Plaintiffs filed their Complaint in this action on December 8, 2023. ECF No. 1.

2. Defendant Chang's Dynasty LLC was served with the Complaint in this action on or about December 20, 2023. ECF No. 6.

3. To-date, Defendant Alan Chang has not yet been served with the Complaint.

4. On January 3, 2024, counsel for Defendants requested an extension of time to respond to the Complaint from counsel for Plaintiffs.

5. There is good cause to extend the time by which Defendants may respond to the Complaint in this action because counsel for Defendants were only recently retained by Defendants in relation to this action and require additional time to investigate the facts and circumstances pleaded in the Complaint prior to filing Defendants' responses.

6. Based upon Defendants' request, the Parties have agreed to extend the deadline by which Defendants may respond to the Complaint by 21 days from January 10, 2024 to January 31, 2024, subject to this Court's approval.

7. Defendants have not previously requested an extension of the deadline to respond to the Complaint.

8. Additionally, as Defendant Chang has not yet been personally served, Defendant Chang stipulates to accept service of the Summons and Complaint in this action.

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1 9. The Parties jointly stipulate that Defendant Chang shall have until January 31, 2024
2 to respond to the Complaint in this action.

3 **IT IS SO STIPULATED.**

4 DATED this 9th day of January 2024.

5 /s/ Trey A. Rothell

6 Marc J. Randazza, NV Bar No. 12265
7 Trey A. Rothell, NV Bar No. 15993
8 RANDAZZA LEGAL GROUP, PLLC
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11 Attorneys for Defendants
12 Chang's Dynasty LLC and Alan Chang

13 DATED this 9th day of January 2024.

14 /s/ Douglas Q. Hahn

15 Douglas Q. Hahn (*pro hac vice*)
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28 Attorneys for Plaintiff The Spearmint Rhino
29 Companies Worldwide, Inc. and K-Kel, Inc.

30 **IT IS SO ORDERED:**

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32 UNITED STATES MAGISTRATE JUDGE

33 Dated: _____

1 Case No. 2:23-cv-02040-ART-BNW

2 **CERTIFICATE OF SERVICE**

3 I HEREBY CERTIFY that on January 9, 2024, I electronically filed the foregoing
4 document with the Clerk of the Court using CM/ECF. I also certify that a true and correct copy of
5 the foregoing document is being served via transmission of Notices of Electronic Filing generated
6 by CM/ECF.

7 /s/ Trey A. Rothell
8 TREY A. ROTHELL

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